

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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MELVIN INGRAM;	JACOB GREENWELL;	DARRELL ONSBY;
SHANTEL ADAMS;	LAWONDA HODGES;	FREDERICK RAYFORD;
DAVID BECK;	LAROME HUMPHREY;	JOHN RILES;
DWAYNE BOWENS;	ROBERT KATALTEPE;	ASHLEY ROBERTSON;
ALFREDO CARDENAS;	JOHN LINTNER;	DEANDRE ROSSER;
VERONICA CLEAVES;	KEESHA MCCLINTON;	DUSTIN RUSSELL;
MARCUS COCHRAN;	LAKISHA MCCOY;	PATRICK SHAW;
ROBERT COLUCCI;	CLIFTON MCCOY;	CEDRIC TAYLOR;
LESLIE CREWS;	DEDRECK MCVAY;	JESSE TOWNSEND; AND
ERIC FLAKE;	HARRY OLIVER;	STEVEN WESBY

Individually and as potential class  
Representatives for all similarly  
Situated claimants

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PLAINTIFFS	)
	)
	)
VS.	)
	)
	)
BILL OLDHAM, in his individual capacity and in	)
his official capacity as the Sheriff of Shelby	)
County, Tennessee; ROBERT MOORE, in his	)
individual capacity and in his official capacity as	)
the Jail Director of the Shelby County, Tennessee;	)
CHARLENE McGHEE, in her individual capacity	)
and in her official capacity as the Assistant Chief	)
Jail Security of Shelby County, Tennessee;	)
DEBRA HAMMONS, in her individual capacity	)
and in her official capacity as the Assistant Chief of	)
Jail Programs of Shelby County, Tennessee;	)
SHELBY COUNTY, TENNESSEE, a Tennessee	)
municipality; and TYLER TECHNOLOGIES,	)
INC., a foreign corporation, and other unknown	)
and unnamed Individuals and Entities,	)

NO: 2:17-cv-02795 SHM

DEFENDANTS.

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**MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT BY  
DEFENDANT TYLER TECHNOLOGIES, INC.**

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COMES NOW Defendant Tyler Technologies, Inc. (“Tyler”) and for its unopposed motion for extension of time to file its response to the Complaint, states as follows:

1. The Plaintiffs filed their complaint in the United States District Court for the Western District of Tennessee, Western Division on October 31, 2017. Tyler was served with the Complaint on November 16, 2017.

2. The deadline for responding to the Complaint is December 7, 2017.

3. In light of the Thanksgiving holiday and upcoming holidays, the parties have agreed that Tyler Technologies should have a 30 day extension to Monday, January 8, 2018 to file its response to the Complaint in this matter, subject to the Court’s approval of the same.

4. Counsel for the parties conferred and Plaintiffs do not object to this extension.

WHEREFORE, Defendant Tyler Technologies, respectfully moves this Court for an order extending its time to file a response to the Complaint herein to January 8, 2018.

Respectfully submitted,

s/ Bradley E. Trammell

Bradley E. Trammell (# 13980)  
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**CERTIFICATE OF CONSULTATION**

Brad Trammell, counsel for Defendants, consulted with Steve Wilson, one of Plaintiffs' counsel on November 29, 2017, and Plaintiffs' counsel informed Defendants' counsel that Plaintiffs have no objection to the requested extension of time.

s/ Bradley E. Trammell  
Bradley E. Trammell

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on December 1, 2017, a true and correct copy of the foregoing document was forwarded by electronic means through the Court's ECF System and/or email to:

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s/ Bradley E. Trammell  
Bradley E. Trammell